

EXHIBIT P

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,)
Plaintiff,)
vs.) No. 3:17-cv-05806-RJB
THE GEO GROUP, INC.,)
Defendant.)

30(B)(6) DEPOSITION UPON ORAL EXAMINATION
OF GEO GROUP, INC.
IN THE PERSON OF
RYAN KIMBLE

9:50 a.m.
July 9, 2018

1250 Pacific Avenue 105
Tacoma, Washington 98401-2317



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



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1 Tacoma, Washington; July 9, 2018

2 9:50 a.m.

3 --oOo--

4
5 RYAN KIMBLE,
6 sworn as a witness by the certified court reporter,
7 testified as follows:

8
9 E X A M I N A T I O N

10 BY MS. BAKER:

11 Q. Good morning, Mr. Kimble.

12 A. Good morning.

13 Q. As you know, my name is LaRond Baker and I'm
14 an attorney for the State of Washington in this matter.
15 Our other counsel who's at the table is Andrea Brenneke.
16 And we are here with Cassidy, who is our intern.

17 Would you please state your full name for the
18 record.

19 A. Ryan Edward Kimble.

20 Q. How do you spell your last name?

21 A. K-I-M-B-L-E.

22 Q. And your employer?

23 A. The Geo Group.

24 Q. And what is your position for the Geo Group?

25 A. I'm the associate warden for finance and



1 Group?

2 A. Right at 10 years.

3 Q. How long have you worked for the Geo Group at
4 the Northwest Detention Center?

5 A. Five years.

6 Q. What positions have you held during your
7 employment with the Geo Group at the Northwest Detention
8 Center?

9 A. The same position I currently hold.

10 Q. What position is that?

11 A. The associate warden of finance and
12 administration.

13 Q. What are your duties and responsibilities as
14 the associate warden?

15 A. Documents and responsibilities include
16 purchasing of anything that the facility needs for
17 security and running of the facility, paying all of the
18 bills, and budgeting for the facility.

19 Q. Thank you. What is the Voluntary Work
20 Program?

21 A. The voluntary Work Program is a program that
22 is an ICE program, administered by the facility for ICE.

23 Q. What happens in this program?

24 A. We follow the ICE protocols and ICE rules on,
25 on giving opportunities for detainees to get out and use



1 their mind and use their bodies where they're not just
2 sitting in the detention center housing units.

3 Q. What occurs in the Voluntary Work Program?

4 A. What occurs in the Voluntary Work Program?

5 Detainees sign a sheet that says that they're
6 volunteering to sign up for a program. They decide what
7 they would like to do. That includes laundry. That
8 includes kitchen services. That includes the cleaning
9 of the housing units, the communal spaces where the
10 detainees live. This includes the cleaning of the
11 communal walkways on is the secured side of the facility
12 where the detainees live and where they are housed. And
13 it includes -- I think I said laundry. It's really a
14 self -- it's a cleaning program.

15 Q. Is the Voluntary Work Program integral to
16 operations of the Northwest Detention Center?

17 MS. MELL: Object to the form.

18 A. If we didn't have it, we would still do the
19 same thing. We would still provide the service and
20 maintain the facility based on the PBNDS and high
21 standards.

22 Q (By Ms. Baker) And who would perform those
23 duties if it are were not detainee-workers?

24 MS. MELL: Object to the form of the question.
25 Calls for speculation.



1 Q. But this is your policy?

2 A. This is our policy that mirrors -- this is
3 Geo's policy that mirrors ICE's policy because this
4 program is ICE's Voluntary Work Program and we are bound
5 by all the rules and regulations for ICE.

6 Q. So Geo does terminate detainee-workers from
7 the Voluntary Work Program for unsatisfactory
8 performance?

9 A. No.

10 Q. Let's move on from that exhibit.

11 Is there a list of every position a detainee
12 can perform in the Voluntary Work Program?

13 A. Yes.

14 Q. Where would I find that list?

15 A. I think it was provided with the papers for
16 the facility. The facility provided it. It is the --
17 if understand right, it will say kitchen and/or it will
18 say laundry. It will say housing unit, pod porter. I
19 don't know if they use the word "pod porter." That's my
20 previous work coming through. Pod cleaner.

21 (Deposition Exhibit No. 3 marked for
22 identification.)

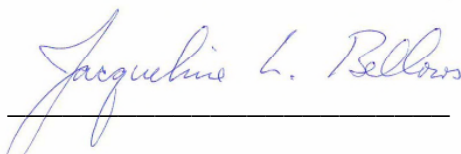
23 MS. MELL: I'm going to offer Exhibit 3 as a
24 uniform exhibit. There's no -- it's several different
25 documents. It's not a list. But other than that, I



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this
27th day of July, 2018.



Jacqueline L. Bellows
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